

**COFFEY | BURLINGTON**  
ATTORNEYS AT LAW

Via CM/ECF

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

March 1, 2021

**KENDALL COFFEY**

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RE: *United States v. Kozel*, Case No. 19-cr-460-KMW  
Motion to Continue Sentencing

**MEMO ENDORSED**

Dear Judge Wood:

We write on behalf of Defendant Todd Kozel seeking a sixty-day continuance of the upcoming sentencing hearing scheduled to take place before Your Honor on March 22, 2021.

In late 2020, Mr. Kozel was diagnosed with metastatic pharyngeal squamous cell carcinoma. He recently underwent an eight-week course of radiation and chemotherapy treatment. As a result, he is extremely weak and has been unable to meet with his attorneys and accountants to prepare for sentencing. Therefore, we are requesting a sixty-day continuance of the sentencing hearing and corresponding deadline to submit the Defendant's Sentencing Memorandum.

Assistant United States Attorneys Louis Pellegrino and Olga Zverovich have no objection to this request.

We ask that you endorse this letter confirming the continuance.

Sentencing is adjourned to  
May 25, 2021, at 11:00 a.m.  
Defendant's submission is due  
by May 11. Government  
submission is due by May 18.

Respectfully submitted,

/s/Kendall B. Coffey

Kendall B. Coffey  
Counsel for ~~Todd Kozel~~  
**SO ORDERED: N.Y., N.Y.**

3/2/21

Kimba M. Wood  
KIMBA M. WOOD  
U.S.D.J.